

RECEIVED
CENTRAL FAX CENTER

JUN 21 2007

Reexam Application No. 90/005,708
Reissue Application No. 09/484,260
Amendment dated May 14, 2007
Reply to Office Action of November 13, 2006

Docket No.: HO-P02233US1

REMARKS

The above identified U.S. Patent was the subject of both a reissue examination filed January 18, 2000 (Reissue Application No. 09/484,260), and a reexamination proceeding filed April 24, 2000 (Reexam Application No. 90/005,708). These proceedings were merged pursuant to a Decision, Sua Sponte, To Merge Reexamination And Reissue Proceedings dated November 28, 2000. Applicant respectfully request that the reissue and reexamination be considered merged for this response and for calculating any fees due for this response.

The oath is objected to as being directed to a broadening reissue. Applicant files herewith the oath originally filed with the Patent Office on December 23, 2002. The enclosed oath is not directed to a broadening reissue.

The claims have been amended to claim an apparatus and method for conducting coiled tubing operations wherein the coiled tubing is at an angle of less than 90° to the surface. Applicant believes the claims are allowable over the prior art because the prior art teaches an angle of 90° and does not teach or suggest receiving the coiled tubing at an angle of less than 90°. Additionally, Applicant believes the amendments to Claim 4 address the 35 U.S.C. 112 objection raised in the office action dated 12/26/03. Applicant also believes the amendments to Claim 11 address the 35 U.S.C. 103(a) rejection raised in the same office action.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

Reexam Application No. 90/005,708
Reissue Application No. 09/484,260
Amendment dated May 14, 2007
Reply to Office Action of November 13, 2006

Docket No.: HO-P02233US1

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 06-2375, under Order No. HO-P02233US1/10105685 from which the undersigned is authorized to draw.

Dated: 5/14/2007

Respectfully submitted,

By 

Michael S. McCoy
Registration No.: 46,913
FULBRIGHT & JAWORSKI L.L.P.
Fulbright Tower
1301 McKinney, Suite 5100
Houston, Texas 77010-3095
(713) 651-5151
(713) 651-5246 (Fax)
Attorney for Applicant

**RECEIVED
CENTRAL FAX CENTER****JUN 21 2007**

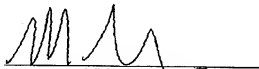
Reexam Application No. 90/005,708
Reissue Application No. 09/484,260
Amendment dated May 14, 2007
Reply to Office Action of November 13, 2006

Docket No.: HO-P02233US1

CERTIFICATE OF SERVICE

I do hereby certify that a copy of the Amendment in Response to Non-Final Office Action in a manner provided in 37 C.F.R. 1.248, is being deposited with the United States Postal Service on May 14, 2007, address to:

Cynthia G. Seal
2925 Briarpark, Suite 930
Houston, Texas 77042


Michael S. McCoy

RECEIVED
CENTRAL FAX CENTER
JUN 21 2007

FULBRIGHT & JAWORSKI L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP

FULBRIGHT TOWER

1301 MCKINNEY, SUITE 6100

HOUSTON, TEXAS 77010-3095

WWW.FULBRIGHT.COM

MMCCOY@FULBRIGHT.COM
DIRECT DIAL: (713) 651-8216TELEPHONE: (713) 651-8151
FACSIMILE: (713) 651-8246

May 14, 2007

CERTIFIED MAIL RETURN RECEIPT REQUESTEDMs. Cynthia G. Seal
2925 Briarpark, Suite 930
Houston, Texas 77042

Certified Article Number

7168 3703 7848 0476 7877

SENDER'S RECORD

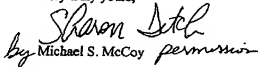
Re: U.S. Reexamination Patent Application No. 90/005,708
Filed: April 24, 2000
U.S. Reissue Patent Application No. 09/484,260
Filed: January 18, 2000
HO-P02233US1 / Client-Matter No. 10105685

Dear Ms. Seal:

Enclosed please find a copy of the Amendment in Response to Non-Final Office Actions dated November 13, 2006 and November 20, 2006 in regard to the above-referenced applications. Along with a copy of the Substitute Reissue Application Declaration by the Inventor.

If you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,


by Michael S. McCoy *permission*



MSM/skd

Enclosures

cc: Mr. Brian G. Petovello

25776847.1

HOUSTON • NEW YORK • WASHINGTON DC • AUSTIN • DALLAS • DENVER • LOS ANGELES • MINNEAPOLIS • SAN ANTONIO • ST. LOUIS
BEIJING • DUBAI • HONG KONG • LONDON • MUNICH • RIYADH

Article Number  7160 3901 9848 0498 7877		COMPLETE THIS SECTION ON DELIVERY	
A. Received by (Please Print Clearly) _____		B. Date of Delivery 6/25/07	
C. Signature 		<input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
D. Delivery address different from item 1? If YES, enter delivery address below:		<input type="checkbox"/> Yes <input type="checkbox"/> No	
J. Service Type CERTIFIED MAIL			
K. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes			
L. Article Addressed to: Ms. Cynthia G. Seal 2925 Briarpark, Suite 930 Houston, Texas 77042			
10105685		Michael S. McCoy	
PS Form 3811, July 2001		Domestic Return Receipt	

7160 3901 9848 0498 7877

✓

TO: Ms. Cynthia G. Seal
 2925 Briarpark, Suite 930
 Houston, Texas 77042

SENDER: Michael S. McCoy

REFERENCE: 10105685

PS Form 3800, June 2000

RETURN	Postage	
RECEIPT	Certified Fee	
SERVICE	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

US Postal Service
**Receipt for
 Certified Mail**

POSTMARK OR DATE

to Insurance Coverage Provided
 to Not Use for International Mail

RECEIVED
CENTRAL FAX CENTER

JUN 21 2007

Approved for use through 06/30/2007 OMB 0851-0037
U. S. Patent and Trademark Office; U.S. DEPARTMENT OF COMMERCE
Under the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number.

Application No. (If known): 08/862,745

Attorney Docket No.: HO-P02233US0

Certificate of Transmission under 37 CFR 1.8

I hereby certify that this correspondence is being facsimile transmitted to the United States Patent and Trademark Office.

on June 21, 2007
Date



Signature

Michael S. McCoy

Typed or printed name of person signing Certificate

46,813

Registration Number, if applicable

(713) 651-8218

Telephone Number

Note: Each paper must have its own certificate of transmission, or this certificate must identify each submitted paper.

Fax Transmission Cover Sheet
Response to Non-Final Office Action
Certificate of Service

Transmittal Form, Amendment Transmittal Letter, Petition for Extension of Time, Amendment in Response to Non-Final Office Action, Certificate of Service, Substitute Reissue Application Declaration by the Inventor and Power of Attorney or Authorization of Agent

Express Mail Receipt, Post Office Receipt, Certified Letter to Cynthia G. Seal and Certified Mail Return Receipt

25789322.1